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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C.

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JUL 15 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Implementation of the Pay  
Telephone Reclassification and  
Compensation Provisions of the  
the Telecommunications Act of 1996

CC Docket No. 96-128

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JUL 15 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**REPLY COMMENTS OF**  
**INMATE CALLING SERVICES PROVIDERS COALITION**

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July 15, 1996

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**TABLE OF CONTENTS**

	Page No.
SUMMARY .....	ii
I. INTRODUCTION .....	1
II. INMATE CALLING SERVICES PROVIDERS MUST BE COMPENSATED FOR ALL CALLS MADE USING THEIR INMATE CALLING SYSTEMS .....	3
A. The Commission Must Prescribe Fair Compensation For 0+ Calls From Inmate Calling Systems .....	3
B. The Commission Should Set A Uniform National Inmate System Compensation Charge .....	5
C. The Commission Already Approved \$ 90 As An Appropriate Level of Compensation For The Equipment And Services Associated With Inmate Calling Systems .....	6
III. THE COMMISSION MUST REQUIRE THAT ALL LEC INMATE CALLING SYSTEM ASSETS ARE TRANSFERRED SO THAT RATEPAYERS RECEIVE THE FULL VALUE .....	7
IV. THE COMMISSION MUST ENSURE THAT APPROPRIATE SAFEGUARDS ARE PUT INTO PLACE TO END THE SUBSIDIZATION OF BOC INMATE CALLING OPERATIONS AND DISCRIMINATION AGAINST INDEPENDENT ICSPS .....	9
V. CONCLUSION .....	11

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**SUMMARY**

The Inmate Calling Services Providers Coalition ("Coalition") hereby submits its Reply Comments in response to the Commission's Notice of Proposed Rulemaking, FCC 96-254 (June 6, 1996) ("Notice").

In writing its rules implementing Section 276 of the Communications Act of 1934, as recently amended by the Telecommunications Act of 1996 (the "Act"), the Commission must recognize that the provision of inmate calling services is a distinct, specialized industry. A regulation that makes sense in the public payphone environment may not be sufficient for the inmate environment.

Perhaps most critically, as discussed in Section II, while the Commission tentatively concludes in the Notice that it need not prescribe compensation for 0+ collect calls generally, whatever the disposition in the payphone context, the Commission must prescribe compensation for 0+ calls in the inmate environment. Section 276 requires fair compensation for all completed calls. Since in the inmate environment all calls are 0+ collect calls, the Commission must address such calls to comply with Section 276's mandate.

Of the dozens of parties filing comments in this proceeding, only MCI argues that the Commission should not prescribe compensation for inmate 0+ collect calls. MCI's reasoning, however, is completely unintelligible.

In any case, the Coalition asks only to receive the same treatment that MCI and the other Big Three interexchange carriers receive. MCI's tariff for its Maximum

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Security Inmate Collect service reflects the same \$.90 inmate system compensation element that the Coalition is seeking for all inmate calling services providers. AT&T's and Sprint's tariffs for their versions of the same service also reflect the \$.90 charge.

It is also important, as discussed in Section III, that the Commission ensure that the transfer of LEC-owned inmate calling system assets is done in such a way that ratepayers do not bear the cost of the transfer. This means that where the market value of an asset exceeds the book value, the asset must be transferred at market value. Otherwise, the LECs' contracts with confinement facilities will be excluded from valuation, and ratepayers will lose a significant percentage of the value of the transferred assets.

Finally, as discussed in Section IV, the Commission must follow the clear command of Section 276 and, at a bare minimum, put into place all of the safeguards required by Computer III, including the filing of CEI plans. The Coalition, however, agrees with the Georgia Public Communications Association that, while Section 276 specifies Computer III as the minimum standard for the required nonstructural safeguards for the BOCs, it is just that – a minimum. The Commission can and must impose stronger safeguards where necessary to end the BOCs' current subsidization and discrimination, as the Act directs.

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C.**

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In the Matter of )

Implementation of the Pay )  
Telephone Reclassification and )  
Compensation Provisions of the )  
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CC Docket No. 96-128

**REPLY COMMENTS OF**  
**INMATE CALLING SERVICES PROVIDERS COALITION**

The Inmate Calling Services Providers Coalition ("Coalition") hereby submits its Reply Comments in response to the Commission's Notice of Proposed Rulemaking, FCC 96-254 (June 6, 1996) ("Notice") in the above-captioned proceeding.

**I. INTRODUCTION**

In writing its rules implementing Section 276 of the Communications Act of 1934, as recently amended by the Telecommunications Act of 1996 (the "Act"), the Commission must recognize that the provision of inmate calling services is a distinct, specialized industry. As the Coalition explained in its initial comments, the inmate calling environment is unique. Inmate calling services providers ("ICSPs") must ensure that security is maintained and must address the high levels of fraudulent calling from confinement facilities, while at the same time providing inmates with fair and adequate

access to phones. In order to do so, ICSPs have developed an integrated package of equipment and services specifically designed to meet the needs of the confinement facility environment. As explained more fully in the Coalition's initial comments, not only do ICSPs provide the calling equipment itself: they also provide integrated operator services and extensive call control and monitoring functions throughout the call.

Public payphone providers, by contrast, provide only a gateway to the public network. Once a call placed from a payphone reaches the network, the payphone provider's involvement in the call essentially ends

In implementing Section 276's mandate, the Commission must recognize that public payphone and inmate calling services are different and that a regulation that makes sense in the public payphone environment may not be sufficient for the inmate environment. Perhaps most critically, while the Commission tentatively concludes in the Notice that it need not prescribe compensation for 0+ collect calls generally, whatever the disposition in the payphone context, the Commission must prescribe compensation for 0+ calls in the inmate environment, for all the reasons explained in the Coalition's initial comments.

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**II. INMATE CALLING SERVICES PROVIDERS MUST BE  
COMPENSATED FOR ALL CALLS MADE USING THEIR INMATE  
CALLING SYSTEMS**

**A. The Commission Must Prescribe Fair Compensation For 0+  
Calls From Inmate Calling Systems**

As many of the commenters in this proceeding recognized, the "keystone of Section 276 is its mandate to the Commission to prescribe"<sup>1</sup> regulations establishing a per call compensation plan that will ensure that all payphone service providers are fairly compensated for each and every completed call using their payphones. In the inmate environment, as the Coalition explained in its Comments, this means that the Commission must ensure fair compensation for 0+ calls -- the only type of call that can be made from the vast majority of inmate calling systems and hence the only call for which the Commission can ensure fair compensation.

Most commenters addressing the issue recognized that the Commission's mandate under Section 276 extends to 0+ calls. They, like the Coalition, read Section 276's unequivocal command that the Commission must "ensure that all payphone service providers are fairly compensated for each and every completed intrastate and interstate call"<sup>2</sup> to mean what it says.<sup>3</sup>

A handful of commenters did, however, suggest that the Commission need not prescribe compensation for 0+ calls from payphones generally. They argue that

<sup>1</sup> Comments of Ameritech at 1.

<sup>2</sup> 47 U.S.C. § 276(b)(1)(A),

<sup>3</sup> See, e.g., Comments of Ameritech at 3 ("the Commission's tentative conclusion excluding '0+' calls from the reach of per-call compensation is not in compliance with Section 276").

adequate compensation for such calls results from the negotiations between the payphone provider and its presubscribed OSP.<sup>4</sup> The Coalition, however, agrees with Ameritech that Congress did not intend "that the Commission should allow per-call compensation to be exclusively the subject of private negotiations . . . ."<sup>5</sup>

Furthermore, applying a uniform compensation charge to 0+ calls is perfectly consistent with a system of negotiated compensation for 0+ calls. Since there are a number of circumstances in which 0+ calls may not be fairly compensated at present, in order to ensure fair compensation on 0+ calls the fair compensation rate should apply uniformly to 0+ calls as well as other coinless calls.

In any case, while the Coalition believes that the Commission is required by Section 276 to prescribe fair compensation for 0+ calls generally, it is imperative that the Commission do so with respect to inmate 0+ calls. As explained in the Coalition's initial comments, such compensation is critical if full competition is to continue to develop in the inmate calling industry.

Of the dozens of parties filing comments in this proceeding, only MCI argued that the Commission need not ensure fair compensation for 0+ calls from inmate calling systems. According to MCI, "the owner of inmate-only payphones can ensure that it receives fair compensation through the system used to select the OSP and payphone provider for a prison."<sup>6</sup> This argument is completely unintelligible and demonstrates MCI's clear lack of understanding of the inmate calling marketplace. The "owner of the

<sup>4</sup> See, e.g., AT&T Comments at 4.

<sup>5</sup> Ameritech Comments at 4.

<sup>6</sup> MCI Comments at 3, ¶ 16.



inmate-only payphones" is the provider. And, in nearly every case, the equipment provider also provides its own operator service. The Coalition cannot even guess as to the meaning of MCI's argument.

In any case, the Coalition asks only to receive the same treatment that MCI receives. As discussed more fully in Section II(C) below, MCI's interstate tariff reflects a \$.90 rate element for its inmate calling services. This element compensates MCI for a package offering of equipment, functionality, and services very similar to the those offered by independent ICSPs. If MCI is entitled to fair compensation for its offering, then it should not be heard to object to other ICSPs being fairly compensated for theirs.

**B. The Commission Should Set A Uniform National Inmate System Compensation Charge**

A number of commenters suggested that the Commission should not directly set local rates and should instead either set guidelines for the states or leave the task to the states altogether. Those comments addressed the local coin calling rate. The Coalition's proposal for the inmate environment would not involve the Commission in the setting of any local rates. Instead, it adds a flat compensation element to compensate ICSPs for the integrated package of equipment and services required in the inmate environment. This preserves independent state judgments as to the appropriate rate for 0+ inmate collect calls while at the same time ensuring "fair compensation" for ICSPs, as mandated by Section 276

**C. The Commission Already Approved \$.90 As An Appropriate Level Of Compensation For The Equipment And Services Associated With Inmate Calling Systems**

In its initial comments, the Coalition demonstrated that the Commission has already approved a \$.90 compensation element for inmate 0+ collect calls by accepting AT&T Communications' tariff revision instituting its "AT&T Prison Collect with Control Service." The Commission has also accepted tariffs for nearly identical services filed by MCI and Sprint, which also reflect a \$.90 compensation element for inmate calling services.

Sprint's tariff revision introducing its PrisonFON™ Collect Calling Control Service became effective February 1, 1995.<sup>7</sup> As with AT&T's inmate calling service, the call control functions of Sprint's PrisonFON™ service are nearly identical to those offered by the typical ICSP.<sup>8</sup> The PrisonFON™ collect charge is \$3.00 per call. At the time the tariff revision was filed, Sprint's non-inmate collect call charge was \$2.10. Similarly, the tariff for MCI's Maximum Security inmate collect service also reflects a \$3.00 charge for inmate collect calls as opposed to a \$2.10 rate for non-inmate collect calls.<sup>9</sup> That service is also very similar to the call control functions offered by ICSPs.<sup>10</sup>

The Commission has thus accepted the very inmate system compensation charge advocated by the Coalition for three separate ICSPs. There is no reason for it not to do so now with respect to all ICSPs. The Commission should prescribe that a \$.90

<sup>7</sup> See PrisonFON™ Collect Calling Control Service tariff revision (attached as Exhibit 1).

<sup>8</sup> See Id.

<sup>9</sup> See Maximum Security Collect tariff revision (attached as Exhibit 2).

<sup>10</sup> See MCI's marketing materials describing the Maximum Security service (attached as Exhibit 3).

inmate system compensation charge, payable to the ICSP by the called party be added to each and every completed inmate 0+ collect call to ensure the "fair compensation" for such calls required by Section 276.

**III. THE COMMISSION MUST REQUIRE THAT ALL LEC INMATE CALLING SYSTEM ASSETS ARE TRANSFERRED SO THAT RATEPAYERS RECEIVE THE FULL VALUE**

In its initial comments, the Coalition urged the Commission to ensure that the transfer of LEC inmate calling system assets required by Section 276 is done in such a way as to ensure that the ratepayers do not bear the costs of the transfer. Among other things, this means that where the market value of an asset exceeds the book value, the asset must be transferred at market value. Ameritech, in its comments, supports this approach, stating that "assets should be transferred at the higher of estimated fair market value or net book value."<sup>11</sup>

Not surprisingly, however, the RBOC Coalition and several individual BOCs urge the Commission instead to require that assets be transferred at net book value regardless of the assets' actual fair market value.<sup>12</sup> However, they advance no legitimate reason why ratepayers should be denied the benefit of the full value of the transferred assets.

The BOCs suggest that net book valuation is appropriate in the payphone context because it is the valuation method that the Commission applied when it deregulated CPE.<sup>13</sup> However, as the Commission made clear in that earlier proceeding,

<sup>11</sup> Comments of Ameritech at 13-14.

<sup>12</sup> See, e.g., RBOC Coalition Comments at 27-29.

<sup>13</sup> RBOC Coalition Comments at 27.

actual "economic value is the proper valuation standard, and that economic value should be defined to mean the price a carrier would be willing to pay . . ."<sup>14</sup> The Commission adopted net book valuation only because it believed that net book value provided an appropriate surrogate for the economic value of the BOCs' CPE.<sup>15</sup> However, in the case of payphones generally, and inmate calling services in particular, net book value is not an adequate measure of the economic value of the assets in question. Net book value does not capture the value of the contracts between the LECs' inmate operations and confinement facilities. As demonstrated in the Coalition's initial comments, such contracts are often worth more than the underlying physical assets themselves. If the contracts are excluded from the valuation of the LECs' transferred assets, ratepayers will lose a significant percentage of the value of the transferred assets.

The BOCs also argue that their payphones should only be reclassified to the extent that they are CPE.<sup>16</sup> However, as explained more fully in the Coalition's initial comments, Section 276 requires the removal of inmate systems from regulated accounts regardless of whether they are located on the customer's premises or attached to the LEC's network in the central office.

<sup>14</sup> Procedures for Implementing the Detariffing of Customer Premises Equipment and Enhanced Services (Second Computer Inquiry), Report and Order, 95 FCC 2d 1276, 1306 (1983) ("Detariffing Order").

<sup>15</sup> Id.

<sup>16</sup> RBOC Coalition Comments at 23, 27-30.

**IV. THE COMMISSION MUST ENSURE THAT APPROPRIATE  
SAFEGUARDS ARE PUT INTO PLACE TO END THE SUBSIDIZATION  
OF BOC INMATE CALLING OPERATIONS AND DISCRIMINATION  
AGAINST INDEPENDENT ICSPS**

The Coalition agrees with the Georgia Public Communications Association that, while Section 276 specifies Computer III as the minimum standard for the required nonstructural safeguards for the BOCs, it is just that -- a minimum.<sup>17</sup> The Commission can and must impose stronger safeguards where necessary to end the BOCs' current subsidization and discrimination, as the Act directs.

Not surprisingly, however, the RBOC Coalition argues that the Computer III "safeguards are more than sufficient to protect competition in the payphone market. No other safeguards are needed."<sup>18</sup> This view ignores the fact that, as demonstrated in the Coalition's initial comments, the BOCs have a history of anticompetitive conduct in the inmate calling services industry that the Commission must ensure is brought to an end.

What is surprising is that the RBOC Coalition asks the Commission to ignore the express language of Section 276 and not order the BOCs to file CEI plans, as required by Computer III.<sup>19</sup> While, as the Coalition explained in its initial comments, BOC compliance with the CEI regime is not enough to ensure an end to subsidization and discrimination in the inmate calling services marketplace, it is an important first step in that direction.

<sup>17</sup> See Comments of the Georgia Public Communications Association at 20.

<sup>18</sup> RBOC Coalition Comments at 33.

<sup>19</sup> RBOC Coalition Comments at 34.

In an effort to escape that obligation, the RBOC Coalition argues that payphones are CPE, not enhanced services, and that the filing of CEI plans would thus be unprecedented.<sup>20</sup> The RBOC Coalition, however, misinterprets Section 276. It is irrelevant that BOC payphones are not enhanced services. Section 276 does not limit the application of the Computer III safeguards to the BOCs' operations to the extent that they fall into any particular category. Instead, Section 276 clearly directs the Commission to apply all of the Computer III safeguards to BOC payphone operations without qualification.<sup>21</sup> Ameritech acknowledges this in its comments: "Taking into account the express directive of the statute, Ameritech does not seek to challenge the tentative conclusions reached in regard to the applicability of Computer III and the filing of CEI and ONA plans."<sup>22</sup> The Commission must follow the clear command of Section 276 and put into place all of the safeguards required by Computer III, including the filing of CEI plans.

<sup>20</sup> Id.

<sup>21</sup> As discussed above, this also means that inmate calling system assets located in the BOCs' networks are deregulated, as were enhanced services in Computer III, and must be transferred out of regulated accounts in accordance with the valuation standard discussed in Section III supra.

<sup>22</sup> Comments of Ameritech at 15.

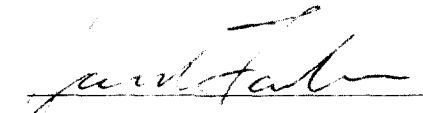
**V. CONCLUSION**

For the reasons shown above and in the Coalition's initial comments, the Commission should:

1. Prescribe the same \$.90 inmate system compensation charge that it has already approved for AT&T, MCI and Sprint for all ICSPs, as required by Section 276.
2. Require that LEC-owned inmate calling system assets are transferred from regulated to unregulated accounts at the higher of fair market or net book value, and further require that the assets to be transferred include the LECs' confinement facility contracts, to ensure ratepayers do not bear the cost of the transfer.
3. Establish the necessary safeguards to put an end to the subsidization of BOC inmate divisions and the BOCs' discrimination against independent ICSPs, including, but not limited to, all the safeguards required by Computer III.

July 15, 1996

Respectfully submitted,



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SPRINT

TARIFF F.C.C. NO. 1

Original page

1st Revised page 159.2

Cancels Original page 159.2

## SPECIALIZED COMMON CARRIER SERVICE

4. SERVICE AND RATE DESCRIPTION (Continued)4.4 Miscellaneous Services (Continued)4.4.12 PrisonFON Service (Continued)D. PrisonFON<sup>SM</sup>

(S)

PrisonFON<sup>SM</sup> Collect Calling Control Service, where available, permits inmates to place automated, operator assisted collect calls through a call control device to authorized telephone numbers. A caller would place the call by dialing his/her authorization code and destination number. The call control device would verify the called number and ask for the caller's name. The call control device would then dial the number and hand off the call to Sprint via dial one service. Upon connection of the call the call control device would announce the call as a prison collect call, the calling party's name and request if a collect call would be accepted. If the call is accepted, the call is connected and billing process begins. If the call is not accepted, the call will be terminated by the call control device. PrisonFON collect calling control calls cannot be converted from a collect call to a calling card call by the billed party.

Telephones subscribed for this service may be controlled for any of the following:

- a Duration of call
- a Time of day
- a Number of calls placed per individual
- a Permission restrictions
- a Call tracking
- a Restriction lines

Calls utilizing PrisonFON Call Control Service can terminate intrastate, interstate and internationally to Canada, Mexico and South America. Interstate calls will be billed at the rates in Sections 5.6.10.3.2 and 5.6.10.3.3 herein. International calls will be billed at the rates in Section 5.6.10.3.2, 5.6.10.3.3 (Canada) and 5.6.10.3.4 (Mexico) herein. A per call collect surcharge as shown in Section 5.6.10.3 will apply.

(2)

PrisonFON Call Control Service presently is available from Nevada only.

(S)

(1)

(1)

(S) Effective date of reissued material is February 1, 1995

ISSUED:

January 31, 1995

ISSUING OFFICES:

Sprint Communications Company L.P.  
Naybeth M. Banks  
1850 H Street, N.W., Suite 1110  
Washington, D.C. 20036

EFFECTIVE:

February 1, 1995

SPRINT

TARIFF F.C.C. NO. 1  
 Original page  
 11th Revised page 343  
 Cancels 10th page 343

## SPECIALIZED COMMON CARRIER SERVICE

5. RATES AND CHARGES (Continued)5.6 Miscellaneous Services (Continued)5.6.10 PublicFON Service (Continued)

- B. Per Minute Rates--Interstate (From (1) the U.S. Mainland (excluding Alaska) to Hawaii, Wake and Midway Islands; and (2) from Hawaii to the U.S. Mainland (excluding Alaska), Wake and Midway Islands (Continued)

(D)  
 (D)

2. Operator Station-to-Station

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL MINUTE	EACH ADD'L MINUTE	INITIAL MINUTE	EACH ADD'L MINUTE	INITIAL MINUTE	EACH ADD'L MINUTE
1-10	.2500 (1)	.2500 (1)	.1500 (1)	.1500 (1)	.1300 (1)	.1300 (1)
11-22	.2500	.2500	.1600	.1600	.1300	.1300
23-34	.2600	.2600	.1800	.1800	.1400	.1400
35-46	.2700	.2700	.1800	.1800	.1500	.1500
47-58	.2700	.2700	.1800	.1800	.1500	.1500
59-70	.2700	.2700	.1900	.1900	.1600	.1600
71-82	.2700	.2700	.1900	.1900	.1600	.1600
83-94	.2900	.2900	.2000	.2000	.1600	.1600
95-106	.2900	.2900	.2000	.2000	.1700	.1700
107-118	.2900	.2900	.2200	.2200	.1800	.1800
119-130	.3200	.3200	.2300	.2300	.1800	.1800
131-142	.3500 (1)	.3500 (1)	.2400 (1)	.2400 (1)	.1900 (1)	.1900 (1)

ISSUED:  
 January 31, 1995

ISSUING OFFICER:  
 Sprint Communications Company L.P.  
 Marybeth M. Banks  
 1850 M Street, N.W., Suite 1110  
 Washington, D.C. 20036

EFFECTIVE:  
 February 1, 1995

## SPRINT

TARIFF F.C.C. NO. 1

Original page 38923rd Revised page 389Cancels 22nd page 389

## SPECIALIZED COMMON CARRIER SERVICE

5. RATES AND CHARGES (Continued)5.6 Miscellaneous Services (Continued)5.6.10 PublicFON Service (Continued)K. Service Charges

	Domestic Service Charge Per Call	Canadian <sup>3</sup> Service Charge Per Call	Outbound <sup>2</sup> International Service Charge Per Call	(T)
<u>Customer Dialed</u>				
Mechanized LEC Calling Card	\$0.80	\$1.00	\$2.50	
<u>Operator Assisted</u>				
Collect Person	\$4.50	\$4.50	\$7.00	
Collect Station	\$2.10	\$2.25	\$4.50	
LEC Calling Card Person-to-Person	\$4.50	\$4.50	\$7.00	
LEC Calling Card Station-to-Station (Customer-dialed)	\$0.80	\$1.00	\$3.50	
LEC Calling Card Station-to-Station (Operator dialed, (00-))	\$2.10	\$2.25	\$4.50	
FONCARD Person-to-Person	\$4.50	\$4.50	\$7.00	
FONCARD Station-to-Station	\$2.10	\$2.25	\$4.50	
Third Party Number Billed Station-to-Station	\$2.10	\$2.25	\$2.00	
Third Party Number Billed Person-to-Person	\$4.50	\$4.50	\$7.00	
PrisonFON Station-to-Station Collect	\$3.00			
PrisonFON Person-to-Person Collect	\$3.90			

<sup>1</sup> See Section 5.5 for a description of locations included as domestic.<sup>2</sup> These charges will be waived for calls to Guantanamo Bay.<sup>3</sup> This charge applies for calls terminating in Canada from the U.S. (excluding Hawaii, Puerto Rico and the U.S. Virgin Islands). Calls from Hawaii, Puerto Rico and the U.S. Virgin Islands to Canada will receive the Outbound International Service Charge.<sup>4</sup> A per call collect surcharge will be applied by the Foreign FTT.ISSUED:

February 28, 1995

ISSUING OFFICER:Sprint Communications Company L.P.  
Marybeth M. Banks  
1850 M Street, N.W., Suite 1110  
Washington, D.C. 20036EFFECTIVE:

March 14, 1995



28TH REVISED PAGE NO. 19 1 1 1  
 CANCELS 27TH REVISED PAGE NO. 19 1 1 1

### CUSTOMIZED BUSINESS COMMUNICATIONS SERVICE

#### SECTION C - SERVICE DESCRIPTIONS AND RATES

##### 3. METERED USE SERVICE (Cont.)

##### 02 Option A (Required) (Cont.)

##### 024 Operator Assistance, Local Exchange Company Calling Cards, and Payphones (Cont.)

- (g) Calls which are placed from business phones for which prearrangement with MCI have been made and for which certain call parameters are provided to the customer on a real-time basis.
- (h) Calls which are placed from public and semi-public payphones for which the customer pays by inserting coins into the payphone as payment for the calls on a real-time basis. Real-time rated rates do not apply to international calls, except for calls to Canada.
- (i) Calls which are placed by dialing an MCI-provided access number which permits the caller to place a collect or third party-billed call with the assistance of an operator, live or automated in a voice response unit.
- (j) MCI Maximum Security Collect calls which are placed from MCI pre-subscribed authorized institutional phones. Only Operator Station Collect or Person-to-Person Collect calls may be placed from authorized institutional telephone numbers to customers who have previously agreed to accept these calls.

Customers who have the ability to complete the dialed digits of their calls, but choose to dial the appropriate operator code only (e.g., O, OO, 102220), may request the MCI operator to complete the call. A handicapped customer who is unable to dial the call because of his or her handicap may request credit for the surcharge from the operator when the call is made. This operator dialing service is available for calls which fall into categories (a) through (d) only. Usage charges appropriate to each particular category apply. The surcharge, which is found in Section C-3.0243 below, applies to all such domestic calls, and all international calls except for those listed in Section C-3.0271 which can only be reached with the assistance of an operator.

0241 Domestic Calls: For domestic calls falling within classifications (a) and (b) above, usage rates are as listed in Sections C-3.02411 and C-3.02412 below. For domestic calls falling within classification (c), (f), and (g) above, usage rates are listed in Sections C-3.02413 and C-3.02414 below. For domestic calls falling within classifications (e) and (d) above, usage rates are as listed in Section C-3.02415 and C-3.02416 below. For domestic calls falling within classification (h) above, usage rates are listed in Section C-3.02417 below. For domestic calls falling within classification (i) above, usage rates are listed in Sections C-3.02418 and C-3.02419 below. For domestic calls falling within classification (j) above, usage rates are listed in Section C-3.02411.

##### 02411 U.S. Mainland and Hawaii to U.S. Mainland and Alaska or from U.S. Mainland to Hawaii Per Minute Usage Charges:

Rate Mileage	DAY		EVENING		NIGHT & WEEKEND	
	1st Min.	Add'l Min.	1st Min.	Add'l Min.	1st Min.	Add'l Min.
1 - 10	\$0.2700	\$0.2700	\$0.1700	\$0.1700	\$0.1500	\$0.1500
11 - 22	0.2700	0.2700	0.1800	0.1800	0.1500	0.1500
23 - 55	0.2800	0.2800	0.2000	0.2000	0.1600	0.1600
56 - 124	0.2900	0.2900	0.2000	0.2000	0.1700	0.1700
125 - 292	0.2900	0.2900	0.2100	0.2100	0.1700	0.1700
293 - 431	0.3100	0.3100	0.2100	0.2100	0.1700	0.1700
432 - 926	0.3100	0.3100	0.2100	0.2100	0.1700	0.1700
927 - 1910	0.3100	0.3100	0.2100	0.2100	0.1800	0.1800
1911 - 3000	0.3100	0.3100	0.2400	0.2400	0.2000	0.2000
3001 - 4250	0.3400	0.3400	0.2500	0.2500	0.2000	0.2000
Over 4250	0.3700	0.3700	0.2600	0.2600	0.2100	0.2100

- 1 Available in the States of Colorado, Washington, Nebraska and Minnesota and, on an experimental basis only, in the State of Florida.
- 2 See Section C-3.0211 for calculation of intercity mileage and rate period definitions.

ISSUED: March 30, 1995

ISSUED BY:

Sue Wellson  
 Manager, Tariffs & Rates  
 1901 Pennsylvania Avenue, N.W.  
 Washington, DC 20006

EFFECTIVE: April 3, 1995

CUSTOMIZED BUSINESS COMMUNICATIONS SERVICESECTION C - SERVICE DESCRIPTIONS AND RATES3. METERED USE SERVICE (Cont.)02 Option A (Executive) (Cont.).024 Operator Assistance, Local Exchange Company Calling Cards, and Payphones (Cont.)

- (g) Calls which are placed from business phones for which prearrangement with MCI have been made and for which certain call parameters are provided to the customer on a real-time basis.
- (h) Calls which are placed from public and semi-public payphones for which the customer pays by inserting coins into the payphone as payment for the calls on a real-time basis. Real-time rated rates do not apply to international calls, except for calls to Canada.
- (i) Calls which are placed by dialing an MCI-provided access number which permits the caller to place a collect, third party-billed, local exchange carrier or commercial calling card-billed call with the assistance of a live operator, or an automated voice response unit.
- (j) MCI Maximum Security Collect calls which are placed from MCI pre-subscribed authorized institutional phones. Only Operator Station Collect or Person-to-Person Collect calls may be placed from authorized institutional telephone numbers to customers who have previously agreed to accept these calls.

Customers who have the ability to complete the dialed digits of their calls, but choose to dial the appropriate operator code only (e.g. 0-, 00-, 102220), may request the MCI operator to complete the call. A handicapped customer who is unable to dial the call because of his or her handicap may request credit for the surcharge from the operator when the call is made. This operator dialing service is available for calls which fall into categories (a) through (d) only. Usage charges appropriate to each particular category apply. The surcharges which are found in Section C-3.0243 below, apply to all such domestic calls, and all international calls except for those to countries listed in Section C-3.071 which can only be reached with the assistance of an operator.

0241 Domestic Calls: For domestic calls falling within classifications (a) and (b) above, usage rates are as listed in Sections C-3.02411 and C-3.02412 below. For domestic calls falling within classification (c), (f), and (g) above, usage rates are listed in Sections C-3.02413 and C-3.02414 below. For domestic calls falling within classifications (d) and (e) above, usage rates are as listed in Section C-3.02415 and C-3.02416 below. For domestic calls falling within classification (h) above, usage rates are listed in Section C-3.02417 below. For domestic calls falling within classification (i) above, usage rates are listed in Section C-3.02418 below. For domestic calls falling within classification (j) above, usage rates are listed in Section C-3.02411.

02411 U.S. Mainland and Hawaii to U.S. Mainland and Alaska or from U.S. Mainland to Hawaii Per Minute Usage Charges:

Inter-city Mileage Band <sup>2</sup>	DAY		EVENING		NIGHT & WEEKEND	
	1st Min.	Add'l Min.	1st Min.	Add'l Min.	1st Min.	Add'l Min.
1 - 10	\$0.3300	\$0.2800	\$0.2600	\$0.2100	\$0.2200	\$0.1700
11 - 22	0.3500	0.3000	0.2700	0.2200	0.2400	0.1900
23 - 55	0.3900	0.3400	0.2800	0.2300	0.2500	0.2000
56 - 124	0.4000	0.3800	0.2800	0.2300	0.2500	0.2000
125 - 292	0.4100	0.3800	0.2800	0.2300	0.2500	0.2000
293 - 430	0.4100	0.3600	0.3000	0.2500	0.2600	0.2100
431 - 925	0.4100	0.3600	0.3100	0.2600	0.2600	0.2100
926 - 1910	0.4200	0.3700	0.3200	0.2700	0.2700	0.2200
1911 - 3000	0.4200	0.3700	0.3300	0.2800	0.2800	0.2300
3001 - 4250	0.4300	0.3800	0.3400	0.2900	0.2800	0.2300
4251 +	0.4500	0.4000	0.3400	0.2900	0.2900	0.2400

<sup>1</sup> Available in limited service areas where facilities permit.

<sup>2</sup> See Section C-3.0211 for calculation of intercity mileage and rate period definitions.

CUSTOMIZED BUSINESS COMMUNICATIONS SERVICESECTION C - SERVICE DESCRIPTIONS AND RATES3. METERED USE SERVICE (Cont.).02 Option A (Executive) (Cont.).024 Operator Assistance, Local Exchange Company Calling Cards, and Payphones (Cont.)

.0243 Surcharges: The following undiscountable surcharges apply: (i) to all domestic and international calls, including calls to Directory Assistance; and (ii) to all WorldPhone calls which fall under classifications (el), (f), (g), and (i) above, except for the Coin-Sent-Paid Operator surcharge, which applies only to calls which fall under classification (h).

	Surcharge <sup>1</sup> Per Call For Domestic Calls	Surcharge <sup>1</sup> Per Call For International Calls
Operator Station	\$2.25	\$4.00
To Canada	N/A	\$2.25
To Mexico	N/A	\$2.25
Operator Station Collect <sup>2</sup>	\$2.25 <sup>2,3</sup>	\$7.00
From Canada	N/A	\$2.25
From Mexico	N/A	\$2.25
Person-to-Person	\$4.90	\$7.00
To Canada	N/A	\$4.50
To Mexico	N/A	\$3.75
Person-to-Person Collect <sup>2</sup>	\$4.90 <sup>2</sup>	\$7.00
From Canada	N/A	\$4.50
From Mexico	N/A	\$3.75
Third Party Billed-Private Phone only (international calls can only be billed to domestic third party numbers)	\$2.35	\$7.00 <sup>4</sup>
To Canada	N/A	\$2.25
To Mexico	N/A	\$2.25
Local Exchange Carrier Card/ Commercial Credit Card	\$1.00 <sup>5</sup>	\$3.00 <sup>6</sup>
To Canada/Mexico	N/A	\$1.00 <sup>6</sup>
WorldPhone		\$2.49 <sup>1,10</sup>
Local Exchange Carrier Card	N/A	\$2.49 <sup>1,10</sup>
Collect (English Speaking Operator)	N/A	\$4.99 <sup>7</sup>
Third Party Billed (English Speaking Operator)	N/A	\$2.49 <sup>1</sup>
Additional Surcharge for Specific Language Speaking Operator		\$0.74 <sup>1,8</sup>
Operator Dialed	\$1.15 <sup>9</sup>	\$1.00 <sup>9</sup>
Coin-Sent-Paid Operator <sup>8</sup>	\$1.95	N/A

<sup>1</sup> These surcharges are subject to Friends & Family discounts when imposed on calls which are eligible for that program.

<sup>2</sup> Charges for collect calls will not be accepted if the called party to whom the charges are to be shifted is at a payphone or institutional phone.

<sup>3</sup> For collect calls which fall under classification (i) above, the Operator Station Collect and Person-to-Person Collect surcharges are \$1.50 and \$2.75, respectively, except that for calls originating in Canada, the Person-to-Person Collect surcharge is \$2.80. For calls billed to Option D (Credit Card), the surcharges in Section C-3.0512 apply. For calls billed to an Option A (MCI Preferred Calling Card), the surcharges in Section C-3.19222 apply. For calls billed to Option T (Feature Card Services), the surcharges in Section C-3.212 apply. For calls billed to a commercial calling card, the surcharges in this Section C-3.0243 apply.

<sup>4</sup> Inbound calling is available from those locations specified in Table V, Part E.

<sup>5</sup> This surcharge will be waived except for calls that originate in China, India, Philippines, Russia, and Ukraine.

<sup>6</sup> This surcharge does not apply for Classification (h) calls originating in Florida.

<sup>7</sup> For calls which fall under classification (i) above, the Operator Station Collect surcharge is \$3.00.

<sup>8</sup> This surcharge applies to Local Exchange Carrier Card/Commercial Credit Card calls placed Station-To-Station or Person-to-Person.

<sup>9</sup> This surcharge does not apply to Operator Dialed calls using Local Exchange Carrier Card/Commercial Credit Card placed Station-To-Station or Person-to-Person.

<sup>10</sup> This surcharge applies to Operator Dialed and Direct Dialed calls.





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